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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

11 This Document Relates to:

12 *Jaylynn Dean v. Uber Techs., Inc.*,
13 N.D. Cal. No. 23-cv-06708
14 D. Ariz. No. 25-cv-4276
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Case No. 23-md-03084-CRB

**DECLARATION OF STEVEN D. COHN,
ESQ. IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTIONS IN LIMINE**

Judge: Honorable Charles R. Breyer

1 I, Steven D. Cohn, hereby declare as follows:

2 1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the State of New
3 York and duly admitted to practice before this Court, representing Plaintiffs in the above captioned
4 action.

5 2. I submit this declaration in support of Plaintiff's Opposition to Defendants'
6 Motions in Limine.

7 3. Attached hereto as Exhibit 1 is a true and correct copy of the ruling issued by Judge
8 Schulman on August 29, 2025 *In Re Uber Rideshare Cases*, JCCP, Superior Court, Case No. CJC-
9 21-005188.

10 4. Attached hereto as Exhibit 2 is a true and correct copy of the document produced
11 as bates no. UBER_JCCP_MDL_000337623.

12 5. Attached hereto as Exhibit 3 is a true and correct copy of the document produced
13 as bates no. UBER_JCCP_MDL_000475307.

14 6. Attached hereto as Exhibit 4 is a true and correct copy of the document produced
15 as bates no. UBER_JCCP_MDL_001717430.

16 7. Attached hereto as Exhibit 5 is a true and correct copy of the document produced
17 as bates no. UBER_JCCP_MDL_000118664.

18 8. Attached hereto as Exhibit 6 is a true and correct copy of the document produced
19 as bates no. UBER_JCCP_MDL_002010063.

20 9. Attached hereto as Exhibit 7 is a true and correct copy of the document produced
21 as bates no. UBER_JCCP_MDL_001319387.

22 10. Attached hereto as Exhibit 8 are true and correct screenshots of video exhibits 1015
23 and 1016 to the deposition of Heather Childs, dated June 5, 2025.

24 11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the deposition
25 of Andrew Hasbun, dated April 10, 2025.

26 12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the deposition
27 of Brooke Anderson, dated May 2, 2025.

28 13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the deposition

1 of Hannah Nilles, dated August 7, 2025.

2 14. Attached hereto as Exhibit 12 is a true and correct copy of the document produced
3 as bates no. UBER_JCCP_MDL_000562614.

4 15. Attached hereto as Exhibit 13 is a true and correct copy of the document produced
5 as bates no. UBER_JCCP_MDL_001441325.

6 16. Attached hereto as Exhibit 14 is a true and correct copy of the document produced
7 as bates no. UBER_JCCP_MDL_003340515.

8 17. Attached hereto as Exhibit 15 is a true and correct copy of the document produced
9 as bates no. UBER_JCCP_MDL_000890205.

10 18. Attached hereto as Exhibit 16 is a true and correct copy of the document produced
11 as UBER000205949.

12 19. Attached hereto as Exhibit 17 is a true and correct copy of the document produced
13 as bates no. UBER_JCCP_MDL_005031659.

14 20. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of the deposition
15 of Valerie Shuping, dated April 18, 2025.

16 21. Attached hereto as Exhibit 19 is a true and correct copy of the document produced
17 as bates no. UBER_JCCP_MDL_003231342.

18 22. Attached hereto as Exhibit 20 is a true and correct copy of the document produced
19 as bates no. UBER_JCCP_MDL_001701663.

20 23. Attached hereto as Exhibit 21 is a true and correct copy of the document produced
21 as bates no. UBER_JCCP_MDL_000122017.

22 24. Attached hereto as Exhibit 22 is a compendium of the documents entered as exhibit
23 numbers 4912 and 4913 to the deposition of Todd Gaddis, dated July 8, 2025.

24 25. Attached hereto as Exhibit 23 is a true and correct copy of the document produced
25 as bates no. UBER_JCCP_MDL_000108957.

26 26. Attached hereto as Exhibit 24 is a true and correct copy of the document produced
27 as bates no. UBER_JCCP_MDL_003922272.
28

1 27. Attached hereto as Exhibit 25 is a true and correct copy of the document produced
2 as bates no. UBER_JCCP_MDL_000484014.

3 28. Attached hereto as Exhibit 26 is a true and correct copy of excerpts of the deposition
4 of Dara Khosrowshahi, dated July 1, 2025.

5 29. Attached hereto as Exhibit 27 is a true and correct copy of excerpts of the deposition
6 of Roger Kaiser, dated April 22, 2025.

7 30. Attached hereto as Exhibit 28 is a true and correct copy of the document produced
8 as bates no. UBER_JCCP_MDL_001732337.

9 31. Attached hereto as Exhibit 29 is a true and correct copy of the document produced
10 as bates no. UBER_JCCP_MDL_001636209.

11 32. Attached hereto as Exhibit 30 is a true and correct copy of the document produced
12 as bates no. UBER_JCCP_MDL_000898569.

13 33. Attached hereto as Exhibit 31 is a true and correct copy of excerpts of the deposition
14 of Rebecca Payne dated May 13, 2025.

15 34. Attached hereto as Exhibit 32 is a true and correct copy of excerpts of the deposition
16 of Jaylynn Dean, dated June 27, 2025.

17 35. Attached hereto as Exhibit 33 is a true and correct copy of excerpts of the deposition
18 of Travis Kalanick, dated July 3, 2025.

19 36. Attached hereto as Exhibit 34 is a true and correct copy of the document produced
20 as bates no. UBER_JCCP_MDL_004753672.

21 37. Attached hereto as Exhibit 35 is a true and correct copy of the document produced
22 as bates no. UBER_JCCP_MDL_001711889.

23 38. Attached hereto as Exhibit 36 is a true and correct copy of the document produced
24 as bates no. UBER_JCCP_MDL_003441012.

25 39. Attached hereto as Exhibit 37 is a true and correct copy of the document produced
26 as bates no. UBER_JCCP_MDL_000564141.

27 40. Attached hereto as Exhibit 38 is a true and correct copy of the document produced
28

1 as bates no. UBER_JCCP_MDL_004216886.

2 41. Attached hereto as Exhibit 39 is a true and correct copy of the document produced
3 as bates no. UBER_JCCP_MDL_001563463.

4 42. Attached hereto as Exhibit 40 is a true and correct copy of the document produced
5 as bates no. UBER_JCCP_MDL_001739193.

6 43. Attached hereto as Exhibit 41 is a true and correct copy of the document produced
7 as bates no. UBER_JCCP_MDL_001100749.

8 44. Attached hereto as Exhibit 42 is a true and correct copy of the document produced
9 as bates no. UBER_JCCP_MDL_001072809.

10 45. Attached hereto as Exhibit 43 is a true and correct copy of the document produced
11 as bates no. UBER_JCCP_MDL_000031164.

12 46. Attached hereto as Exhibit 44 is a true and correct copy of the document produced
13 as bates no. UBER_JCCP_MDL_001773711.

14 47. Attached hereto as Exhibit 45 is a true and correct copy of the document produced
15 as bates no. UBER_JCCP_MDL_000084521.

16 48. Attached hereto as Exhibit 46 is a true and correct copy of the document produced
17 as bates no. UBER_JCCP_MDL_004752785.

18 49. Attached hereto as Exhibit 47 is a true and correct copy of the document produced
19 as bates no. UBER_JCCP_MDL_003040649.

20 50. Attached hereto as Exhibit 48 is a true and correct copy of the Declaration of Todd
21 Gaddis dated August 18, 2025.

22 51. Attached hereto as Exhibit 49 is a true and correct copy of the document titled
23 “Incident Report Field Convenience Descriptions,” produced on March 24, 2025.

24 52. Attached hereto as Exhibit 50 is a true and correct copy of Defendants’ Responses
25 to Plaintiffs’ Interrogatories and Requests for Admission dated August 18, 2025.

26 53. Attached hereto as Exhibit 51 is a true and correct copy of excerpts of the deposition
27 of Katherine McDonald, dated October 7, 2024.
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DECLARATION OF STEVEN D. COHN IN SUPPORT OF PL'S
OPPOSITION TO DES' MOTIONS IN LIMINE